

New Hampshire Special Education Program Approval Evaluation Report

**The Odyssey House
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Final Report

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Evaluation Conducted on

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New Hampshire Special Education Program Approval Evaluation Report

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(Commendations, Citations, and Suggestions for each program)

Note: *It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The private facility is not mandated to implement them.*

New Hampshire Special Education Program Approval Summary Evaluation Report

Odyssey House

I. INTRODUCTION:

A New Hampshire Special Education Program Approval visit was conducted at The Odyssey House. The Program Approval team met on February 10 and 11, 1998, in order to review the status of Special Education services being provided to eligible students.

Activities related to this evaluation included the close review of all the application materials that were submitted by the school and a check of teaching certifications of special education personnel. In addition, interviews were held with the Education Coordinator, special education teachers, regular education teachers, counselors, parents and related service personnel as availability permitted. The team also randomly inspected and reviewed student files from the school, including the file of a student who falls under the James O' Consent Decree. Throughout the visit the team had full cooperation from the school personnel, which was greatly appreciated.

The report that you are about to read represents the consensus of all the members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the NH State Standards have been addressed. If a component is not mentioned, that does not mean that the team did not review it; it just means that there were no exceptions to the Standards found in that particular area.

II. STATUS OF PREVIOUS PROGRAM APPROVAL: *Conducted on October 6, 1993*

Based on review of the previous program approval report and the findings of the team that visited The Odyssey House on February 10 and 11, 1998, it was the team consensus that staff at Odyssey House have made an effort to address the citations from the previous Program Approval. However, there are several issues that continue to require attention and correction.

The previous Program Approval team found that not all staff were certified for the instructional position that they held. This continues to be true in several areas where there are currently no certified staff (mathematics, physical education, music, emotional disabilities, media specialist). Further, one staff member is in the process of applying for enrollment in the PEP program, but presently does not hold any certification. Other staff are certified in the areas of English, social studies, art and elementary education. At the PACE program, a staff member is certified in general special education and elementary education. The administration at Odyssey House have made efforts toward seeking appropriately certified staff or encouraging present staff to seek certification through the Alternative 5 process. One staff member is presently seeking such certification in the area of science and another staff member is in a graduate program for Emotional and Behavioral Disorders. The school presently contracts with a Learning Disabilities specialist for the purposes of interpreting evaluation results, overseeing the IEP process and the implementation of individual student plans. While this contracted service provider does offer support in these areas, her limited time on site does not have the broad impact that

a full time staff member would provide. This is evidenced in the lack of consistent special education process and procedures.

Of significance is the fact that the process used to modify or revise student IEP's following admission is not clearly documented. Without this documentation, it appeared to the Program Approval team that sample goals and objectives are being sent as suggestions to the student's district but that no meeting is held to formally amend the IEP. There is no evidence of Written Prior Notice; formally modified or amended IEP's or team signatures. The Odyssey House does provide regular progress reports, but they do not specifically show progress related to the IEP goals and objectives. This lack of consistent procedure was noted as a citation in the previous Program Approval report and continues to require attention and correction. The staff at Odyssey House state that they do meet to amend IEP's, but that they lack the documentation showing the work of the SEE/PT.

The Odyssey House now has written emergency procedures which are found in the Staff Procedural Handbook.

While The Odyssey House program does not presently contract with an individual certified in Physical Education, they have continued to develop a recreation program that includes many activities and components found in physical education programs. The administration is aware of the need to seek the consultation of a certified physical education instructor.

III. ISSUES OF SIGNIFICANCE:

The visiting team was impressed with the effort Odyssey House staff have put toward a full revision of instructional and behavioral methods. The addition of the new experiential instruction and an incorporation of the Attachment Theory combine to create a new and exciting approach in creating programming for this complex adolescent population. All students have been grouped in teams and staff are working together to derive the full benefit from this model. With the assistance of faculty and an intern from the University of New Hampshire, ongoing training and problem solving are evident and effective. This approach to programming offers a value based solution to behavioral issues and engages students in their own learning through real problem solving. This significant change in programming format indicates a shift in philosophy and practice and is noted as a positive program improvement for The Odyssey House school and residence.

An area of significance identified by the visiting team was the lack of special education certified staff at Odyssey House. While there is a staff member certified in general special education at the PACE program in Rochester, she does not have a formalized role with, or regular access to, The Odyssey House program. As a result of this lack of special education certified teaching staff or administration, there are several areas related to specific special education processes that require attention. Specifically, the process related to the admission of special education students and the follow-up meeting to amend or fully rewrite the student's IEP requires revision. The Intake procedure noted on page 13 of the Application packet states that "Addenda to IEP's are sent to schools when necessary." This is an incorrect interpretation of the NH State Standards for Special Education and the administration is directed to review the IDEA and RSA-186-C for full information regarding the implementation of IEP's and the process necessary to revise an IEP. Specifically, the private facility cannot "unilaterally modify a student's individualized education program". The procedure directing staff

to send addenda to schools gives the appearance of neglecting to follow proper procedure and should be corrected.

Private facilities face the challenge of offering their students “equal access to educational opportunities within their programs” and The Odyssey House has worked hard to ensure that students receive a full and equal education. They have noted an ongoing effort to provide a full physical education program and have made some progress toward seeking a certified physical education instructor to consult with the program. They will continue to seek certified staff or consultants in the areas of music, as well as a media specialist. Other certifications needed are in the areas of emotional handicaps, mathematics and science. The developing Odyssey House curriculum is based, in part, on the NH Curriculum Frameworks and this is to be commended. Those students observed appeared to be engaged in their instruction, and the lessons observed by the Program Approval team were well designed, relevant to the range of abilities and interesting.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: The Odyssey House Program

The Odyssey House staff is to be commended for the level of interest and enthusiasm of staff as they continue to design and implement the new experiential instruction component. The ongoing training and consultation is a highly effective means of including all staff in the process of change. Further, the shift in the behavior management program through the adoption of the Attachment Theory and it's related practices, is also likely to provide an effective and appropriate environment for the students at Odyssey House as it becomes established.

The development of an Odyssey House School Handbook by the Education Director is also to be commended. This document, presently in draft form, offers guidelines and direction on a number of school wide issues to all constituents.

The technology plan to bring Odyssey House on-line via Internet access is to be commended. The Odyssey House already utilizes computer technology in a full and appropriate manner through instructional software and word processing opportunities, but this new move to further update the computer system is a positive step forward.

The concept of organizing the school into learning teams is very appropriate. This two month old change has already begun to have a positive impact on the environment of school and residence. The staff hopes that this teaming concept will carry over into the behavior program and positively influence all aspects of programming.

The school staff provided a warm welcome to the visiting Program Approval team and made every effort to assist in the process.

The teaching staff is to be commended for the development of appropriate curriculum as well as for the atmosphere of mutual respect between students and staff that has been established.

Communication systems among staff (educational, residential, counseling, etc.) is well established and highly effective in the area of individual student program planning and problem solving.

CITATIONS: (in numerical order) **The Odyssey House Program**

<u>Ed # 1107.02</u>	4 files did not have evidence of a Written Evaluation Summary.
<u>Ed #1109.01</u>	3 files (IEP's) do not contain present levels of performance, individuals responsible for providing service or transition statements.
<u>Ed #1109.03</u>	2 files did not have information regarding the composition of the IEP team or signature page.
<u>Ed #1109.06 (c)</u>	3 files contained no evidence that representative(s) from Odyssey House participated in the IEP development.
<u>Ed #1109.07 (b)</u>	1 file: private facility does not provide all the equipment and materials necessary to implement the IEP.
<u>Ed #1113.01</u>	2 files did not contain evidence of a vocational evaluation.
<u>Ed # 1133.04 (d) and 1133.05(k)</u>	The file cabinet designated for the student records is not a fire-proof cabinet.
<u>Ed # 1133.06(b)</u>	2 files did not contain midyear and annual evaluations conducted relative to the written IEP.
<u>Ed #1133.08(a)</u> <u>Ed #1133.05(k)</u>	Not all staff hold appropriate certification for the position in which they function.

SUGGESTIONS:

The administration is encouraged to provide inservice training related to basic special education process and procedures, specifically as it relates to the IEP process.

Continue offering staff training related to the area of behavior management. Several staff commented to the visiting team members that, while they agreed in philosophy with the new values based programming, they felt as if they needed to have parts of the old system available to them (i.e. time out spaces, methods of dealing with acting out students). Therefore, it is apparent that ongoing training is necessary to successfully implement this significant shift in programming.

It is suggested that a comprehensive checklist of necessary special education documents be developed for use by both Odyssey House and PACE school staff as part of the intake process, for ongoing documentation of educational planning and other related activity.

It is also suggested that a letter requesting special education data from the sending school districts be developed in an effort to more efficiently and consistently gather all necessary documentation.

SUGGESTIONS, (Con't): The Odyssey House Program

The administration may consider adopting relevant State model forms for their use in implementing special education procedures.

Every effort should be made to hire staff certified in the areas of emotional disabilities and learning disabilities. Effort should also be made to seek staff certified in each of the relevant content areas. In the event that such certified staff are unavailable then the administration of Odyssey House should contract with appropriately certified consultants.

The administration may consider consulting with local special education directors to discover effective methods used by other schools and private facilities.

COMMENDATIONS: PACE Program

The staff are to be commended for their persistent and positive efforts to obtain records, assessments and other documents from sending districts.

The classroom management of individualized student programs is exemplary.

The atmosphere at PACE is structured, caring and focused due to staff consistency and an obvious commitment to the students.

The connection of PACE staff to the Odyssey House staff is well designed and assists in shared staff development, communication and supervision.

CITATIONS: PACE Program

Ed # 1125.04 4 files did not contain evidence of written consent to evaluate.

Ed # 1123.14 4 files did not contain a Record of Disclosure.

Ed # 1109.01 1 file did not contain IEP.

Ed# 1133.08 There is no evidence that regularly scheduled consultation to the special education teacher in the areas of academic content, lesson planning and instructional needs is provided. There is also no consultation provided in the areas of music, physical education and library media etc.

34CFR 300.307 There is no Physical Education Program or specially designed P.E. in IEP's.

SUGGESTIONS:

PACE Program

The administration should arrange for and document the supervision of appropriately certified content area staff, or consultants, to provide instructional support for the PACE teacher. This present instructor, while doing a good job of providing individual tutoring to her students, lacks the qualifications to provide full access to equal educational opportunities as outlined in the minimum state standards.

The PACE Program staff should continue to work closely with Odyssey House staff to develop consistent process and procedures relating to all aspects of the special education process.

ADDENDUM

JAMES O. MONITORING PROGRAM

The Odyssey House / PACE Program

Student File Review

Case Study Document

Reimbursement Claim Form

Case Study Addendum Form

<p style="text-align: center;">ADDENDUM JAMES O. MONITORING PROGRAM</p>

The Odyssey House

CITATIONS:

<u>ED#1107.02 (b) (d)</u>	1 file: There is no evidence of written notification given to parent upon referral ; no evidence of written notice of disposition within 15 days of the initial referral to Special Education Evaluation Team.
<u>ED# 1107.05 (k)</u>	1 file: No evidence that Evaluation was completed within 45 days.
<u>ED#1107.06(a)</u>	1 file: No evidence that an Evaluation Summary Report was completed every three years.
<u>ED#1107.07(c)</u>	1 file: No evidence that the team determining the disability included the correct members.
<u>ED#1123.04(a)(10)</u>	1 file : No record of disclosure evident in file.
<u>ED#1123.05</u>	1 file: There is no evidence of annual notification of rights.
<u>ED#1109.01(m)</u>	3 files: No statement regarding unneeded transition services.
<u>ED#1109.01(d)</u>	1 file: No explanation of student regular class participation.
<u>ED#1109.10(g)</u>	1 file: No projected dates for initiation and anticipated duration of services.
<u>ED#1109.01(k)</u>	1 file: No statement of parties assuming financial responsibility.
<u>ED#1123.03(1)</u>	2 files: No evidence of Statement of Written Prior Notice provided which meets the four criteria specified in the NH Standards.
<u>34CFR 300.307</u>	3 files: No evidence the students participate in a regular physical education program.

SUGGESTIONS:

The staff at Odyssey House should review all NH State and federal guidelines as they apply to the private facility's responsibilities regarding the education of students identified with educational disabilities and establish consistent process and procedures for providing programming. Any new practices should be regularly reviewed with all relevant staff to assure a full understanding of the process and consistent practices.